

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

BHARATKUMAR G. THAKKER,
et al.,

Petitioners-Plaintiffs,

vs.

CLAIR DOLL, in his official capacity as
Warden of York County Prison, et al.,

Respondents-Defendants.

Case No. 1:20-cv-00480-JEJ

Judge John E. Jones III

DECLARATION OF WITOLD J. WALCZAK

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the following is true and correct to the best of my knowledge and belief:

1. My name is Witold J. Walczak. I am the Legal Director for the American Civil Liberties Union of Pennsylvania and am counsel for Petitioners-Plaintiffs. I make this declaration in support of Plaintiffs' Motion for Temporary Restraining Order and/or Preliminary Injunction.

2. Attached hereto are true and correct copies of the following materials, identified by the following exhibit designations in Plaintiffs' Memorandum of Law in support of their Motion For Temporary Restraining Order and/or Preliminary Injunction:

TRO-Ex. 1	World Health Organization website page entitled <i>Coronavirus disease (COVID-19) Pandemic</i>
TRO-Ex. 2	Pennsylvania Department of Health website page entitled <i>Coronavirus (COVID-19)</i>
TRO-Ex. 3	U.S. Immigration & Customs Enforcement website page entitled <i>ICE Guidance on COVID-19</i>
TRO-Ex. 4	News Release from the U.S. Immigrations & Customs Enforcement website entitled <i>ICE detainee tests positive for COVID-19 at Bergen County Jail</i>
TRO-Ex. 5	Article by John Sandweg published on The Atlantic on March 22, 2020, entitled <i>I Used to Run ICE. We Need to Release the Nonviolent Detainees</i>
TRO-Ex. 6	Article by J. David McSwane published on Pro Publica on March 20, 2020, entitled <i>ICE Has Repeatedly Failed to Contain Contagious Diseases, Our Analysis Shows. It's a Danger to the Public</i>
TRO-Ex. 7	Consent Order, Dkt. No. 084230, issued by the Supreme Court of New Jersey on March 22, 2020
TRO-Ex. 8	Letter written by Chief Justice Mike McGrath of the Montana Supreme Court on March 20, 2020
TRO-Ex. 9	Letter written by Scott A. Allen, MD, FACP and Josiah Rich, MD, MPH, to the House and Senate Committees on Homeland Security on March 19, 2020
TRO-Ex. 10	Article by Priscilla DeGregory on the New York Post on March 24, 2020, entitled <i>Coronavirus shuts down some NYC and NJ immigration courts</i>
TRO-Ex. 11	Article by Nathaniel Lash and Brett Sholtis on the Bucks County Courier Times on March 20, 2020, entitled <i>Demand for ICU beds will greatly outstrip availability if coronavirus hits Pa. hard</i>

Dated: March 25, 2020

/s/ Witold J. Walczak

Witold J. Walczak